

REMARKS

Claims 1-34 are pending in the instant application. In the most recent Office Action, the Office Action, claims 1, 2, 6, 7, 11, 12, 14-23, 27, 28, 32 and 33 stand rejected under 35 U.S.C. § 102(a) as allegedly anticipated by an internet paper authored by Rakhi Motwani, designated "Introduction" (hereinafter, "Motwani"). Claims 3, 8, 13, 24, 29 and 34 stand rejected under 35 U.S.C. § 103(a) as allegedly obvious over Motwani in view of U.S. Published Patent Application No. 2001/0054150 by Levy (hereinafter, "Levy"). Claims 4, 5, 9, 10, 25, 26, 30 and 31 stand rejected under 35 U.S.C. § 103(a) as allegedly obvious over Motwani in view of Levy, and further in view of U.S. Patent No. 6,628,719 to Kono, et al. (hereinafter, "Kono"). Applicant respectfully traverses the rejections, for at least the following reasons.

The Office Action, via the attached Notice of References Cited, form PTO-892, attributes a publication date of 01 March 2001 to the Motwani reference. Applicant respectfully traverses, since there is no indication of this or any other date of publication on the face of the document. Notwithstanding, assuming, *arguendo*, that the reference was in fact published as early as 01 March 2001, it is not prior art to the instant application.

The instant application claims the priority benefit under 35 U.S.C. § 119 of Japanese Application No. 2000-157205, filed 26 May 2000, which antedates the purported publication of Motwani. Applicant submits herewith a verified translation of the Japanese priority document in perfection of its claim of priority, 37 C.F.R. § 1.55(a)(4). Therefore, Motwani is not prior art to the present application, and any rejections relying on it are improper. Applicant kindly requests favorable reconsideration and withdrawal of such rejections.

In light of the foregoing, Applicant respectfully submits that all claims recite patentable subject matter, and kindly solicit an early indication of allowability of all claims. If the

Examiner has any reservation in allowing the claims and believes that a telephone interview would advance prosecution, he is kindly requested to telephone the undersigned at an earliest convenience.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "David J. Torrente", with a long horizontal flourish extending to the right.

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